

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**SUPPLEMENTAL DECLARATION OF  
LISA DONAHUE OF ALIXPARTNERS, LLP**

Pursuant to 28 U.S.C. § 1746, I, LISA DONAHUE, state under penalty of perjury, that:

1. I am a Managing Director of AlixPartners, LLP (“AlixPartners”), which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.
2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.
3. I am filing this supplemental declaration to supplement the disclosures that were included in my original declaration dated November 5, 2019 (the “Declaration”) [ECF No. 429].
4. Unless otherwise noted, references to AP below collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

- The Declaration stated at paragraph 20 that AlixPartners' advance payment retainer held as of the Petition Date was \$1,750,000 (the "Retainer"); however, as of the Petition Date, the Retainer held was in fact \$1,642,835.22.
- Andrew M. Troop of Pillsbury Winthrop Shaw Pittman LLP is the father of a current AP employee that is not working on this bankruptcy matter and is amongst the attorneys representing the Ad Hoc Settlement Rejection Group in this bankruptcy matter. Accordingly, an information barrier has been established between the AP employee and AP employees providing services in this bankruptcy matter and the AP employee was instructed not to discuss this bankruptcy matter with her father.
- Kantar Health, Inc., a vendor to the Debtors, affiliate is a current AP client in matters unrelated to the Debtors.
- Otterbourg P.C., a related party in this bankruptcy matter, is a professional to current and former AP clients in matters unrelated to the Debtors.
- State of Nevada, a plaintiff to the Debtors, is a former employer of a current AP employee.
- The son of a current AP employee that is working on this matter is counsel at Davis Polk.

5. AlixPartners does not believe that the supplemental disclosures above impact its disinterestedness. I continue to reserve the right to supplement AlixPartners' disclosures in the event that AlixPartners learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, AlixPartners will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Dated: December 4, 2019  
New York, New York

AlixPartners, LLP

/s/ Lisa Donahue  
Lisa Donahue  
Managing Director